

Sangam

Site: SANGAM
Break: 3, 4, 9
Other: Comments
n/a.

pg. 1-1, P1, Line 4 - electrical misspelled

pg. 1-1, Background - The total background section (all of one page) needs to be completely rewritten. Background section ~~should include~~ is written too simplistic. Should include a discussion on location, site histories, first indication of contamination/problem, Current site status, description of sites; contamination ~~in nature + exten~~. This should be followed by Summary of Past Activities (including a summary of past data collected, geophysical survey, etc).

pg. 1-4, P1, Please delete the last sentence. It is misleading and appears that EPA has withheld guidance.

pg. 1-5 - Delete this page. The Guidance that you reference can be cited in a reference section, and the document itself does not have to be reprinted here.

pg. 1-8 - The use of "Pickens County Sites" is inappropriate. Please use either the names of all the sites or the names as quoted in the NPL proposed listing.



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Pg. 1-9, 6th line - Delete Record of Decision reference.

Pg. 1-9, par 1.4.1 - Delete the EPA Directive reference and include in the reference section.

Pg. 1-10, P 1 Line 7 - Include other divisions or branches of both agencies to whom the water data is reported.

Pg. 1-10, II P 2 - Delete this P and include in the reference section.

Pg 1-11, ~~Permits for~~ Sangam should be in the process of obtaining any permits they need. This process should not delay the RI work once the workplan has been approved.

Pg. 2-4, P 1, line 4 - Define "MCS"

Pg. 2-4 P 1 - ~~Include a~~ Need to mention the ban on PCB's in the discussion.

Pg. 2-4, P 2 , Define "MGD"

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pg. 2-4-2-5 Need more of a discussion on the wastewater treatment facility. ~~the~~ Which parts, if any, are still in operation. Which facility operates under NPDES. ~~How often~~ What is the NPDES monitoring program that Sangano is under, what is sampled for, what are the levels specified in the permit.

pg. 2-5^{TP2} - The remote sites should not be referred to as "privately operated landfills." Refer to them by name or use the NPL designated names.

pg. 2-11 , TP 4 - Define "area 4A"

pg. 2-15 - Nix Site - No mention of the pond on-site. Map does not show an outline of the area that was excavated. Needs to be shown.

pg. 2-15 - Dodgers Site - Show area that was excavated.

pg. 2-18, ²⁻¹⁹ - Please do not generalize. All the sites are different and all are not exactly like the Breazeale Site. Can include some of this in the background discussion on past data.

pg. 2-20 - Generalizing about surface water users. Please do not make this statement until it is investigated during the RI. What about recreational uses?

pg. 2-21 - Include these references in the reference section, not throughout the text.

pg. 2-21, ~~1st P 3~~ - 1st line - Delete the word "can"
2nd line - ~~date~~ delete the word "potential"
3rd line delete towards "where appropriate"

Section 2 maps - Maps are cumbersome and hard to read. Would be more appropriate to include 8" x 11 maps that show the entire site, so the reader can get a good orientation, not just the suspected area of waste deposit. Include all roads, streams, tributaries, etc. Cannot see the whole site so cannot comment on whether something appears to be background, upgradient, downgradient, etc.

Section 3 - Need to consider more treatment options, permanent remedies. At the time of the RD/RA, the 50 ppm limit may not be applicable. The excavate + dispose of contaminants at a company-owned or otherwise owned landfill does not comply with SARA.

pg. 3-13, 1st dot - Not necessary that a technology has been successful on a full-scale.

7th dot - Technology does not have to have been conducted at another site.

pg. 3-13 - "Reasonable" needs to be defined.

pg. 3-16, Stage 2, & Line 3 - "identified" misspelled.

~~pg. 3-17~~

pg. 3-18 - Define "Pickens County Site"

pg. 3-22 - ARARs for VOC's will also apply
not just for PCB's. Need to include these.

pg. 4-6 There is no mention of ^{any} Town Creek sampling.
Table 4-1 - The number of samples is given,
however, no explanation is given as to how this
number was obtained. For example, the 12 ground
water samples indicated 4 wells, 3 samples each
for ?? The same applies for subsurface soil
samples

* Section 4 - Throughout this section, the
sample numbers designated in the text do not
correspond to the descriptors given on page 3-3.
Instead, all surface samples are designated
SS (Sangano Septic Drain Field), and soil borings
are designated SB (Sangano Property Area
B). Monitoring wells on the Sangano Plant
should be numbered 1-60(?) or be designated
SAMW-1.

There is a lot of repetition in this section. Each
site is unique and should be treated as such.
Simply changing names & numbers on a word
processor is not acceptable. For each site,
~~the~~ an explanation should be given explaining
the reasoning behind the sample locations,

the individual site features (ponds, ravines, streams)
~~etc.~~ etc. The discussion on the decontamination pad, is the same and need not be repeated.
 boring procedures, compounding

what kind of streams,
 how much flow,
 where does it flow

Bedrock wells will be installed. The discussion of "if" they will be installed throughout this section should be deleted.

pg. 4-12 - Two sampling periods is sufficient to complete the RI.

pg. 4-12 - 2nd TP - delete the last ~~line~~ sentence -
 Field filtering will not be conducted under any circumstances.

pg. 4-24 - Unclear of just how many decontamination pads will be constructed on the Sangamo Property.

Need a map that shows all the Sangamo Areas ~~and~~ septic tanks, nearby streams, etc. In addition to sampling the ~~one~~ known areas of disposal, other areas around the site should be sampled to ~~determine~~ discover if there are any other suspected areas and to determine whether contamination is leaving the site.

Need to propose wells around the perimeter of the Sangamo Site.

pg. 4-27 - It is stated that if two wells ~~are~~ installed already, then no others will be installed. If the wells were up dry, then wells will be drilled

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until the groundwater can be sampled.

Pg. 4-74 - Sangamo will not be granted variance (per NPDES program) but will, indeed, have to sample this lagoon. The sediments should be sampled such that the sediment is not unduly disturbed and the NPDES permit limits are not exceeded.

Pg. 4-81 - Pad not shown on Plate 4-4

Pg. 4-86 ~~2nd P~~ - Is there a flow component to the ditch at the Breazeale Site.

Pg. 4-87 - Need to report soil/sediment samples in ppm. All groundwater or surface water samples should be reported in ppb. Therefore, the VOC range would be .6 ug/l to 1.4 ug/l).

Pg. 4-87 - Include ~~other~~ reports in reference section.

Pg. 4-95 - Need to sample wells for PCB's in addition to VOC's.

Pg. 4-104 - Plate 4-6 - Two wells labelled MW 2

Pg. 4-117 - Surface samples on the John Trotter Site surround the anomaly, but not on ~~other~~. The other sites. Please explain.

Pg. 4-118 - Plate 4-8, where are the ravines numbered.

pg. 4-129, Table 4-15, indicates 12 surface water samples, however only 8 are shown on the map.

pg. 4-138 - Why is there no soil boring through the scattered waste section.

pg. 4-148 - What about treatability tests for groundwater. May need pilot studies or some innovative technologies.

pg. 4-173 - 4-180 - Table of Contents ~~of RI~~ can be deleted.

pg. 5-1, 2nd IP, Interim Guidance should be included in the reference section.

pg. 8-5 - Delete.

pg. 8-8-10 - Delete

Appendix A - Delete

pg. 9-5 - Schedules - 38 months for an RI/FS is not acceptable.

- All field work should be completed by 4/1/88.
- The draft RI report should be submitted to EPA by 8/1/88.
- The final RI report by 10/30/88.
- The draft FS report should be submitted by 1/30/89

The schedule will stop here. EPA will arrange for the FS public hearing and notify Sangamo when the FS final report is due.

since EPA & Sangamo signed a Consent Agreement & not EPA + RMT

Sangamo Weston Review + Approval should ~~be~~ not be broken out separately. References to Public Meetings should

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be deleted. EPA will schedule these events.